

DAVIDOFF HUTCHER & CITRON LLP
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

QUICKWAY ESTATES LLC,

Case No. 24-22114 (SHL)

Debtor.

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**DECLARATION RELATING TO PAYMENT OF
THIRD-PARTY RETAINER**

Jacob Grunhut, declares under penalty of perjury:

1. I submit this Declaration in support of the application filed by the above-captioned Debtor relating to the retention of Davidoff Hutcher & Citron LLP (“DHC”) as its attorneys as of February 13, 2024.

2. I am the spouse of the Debtor’s sole 100% owner, Sheindy Grunhut.

3. Due to the Debtor’s dire financial situation with regard to its ability to pay the retainer to DHC, on behalf of the Debtor, I paid, prior to the commencement of this Chapter 11 Case, a third-party retainer in the amount of \$17,000 on account of services to be rendered in this Chapter 11 Case (the “Retainer”).

4. I have been advised by DHC to consult with my own counsel, however I have not retained independent legal counsel regarding the payment of the aforementioned Retainer to DHC.

5. I understand that the undivided loyalty of DHC is to its client, the above-captioned Debtor.

6. Further, I am not a creditor of the Debtor and do not have any intention of asserting a claim against the estate of the Debtor for funds advanced for legal fees in this case.

7. Based upon the foregoing, it is my belief that I do not have any adverse interest against the estate of the Debtor herein, or with any creditor or any other party in interest.

Dated: February 22, 2024

/s/ Jacob Grunhut
Jacob Grunhut